



State of New Jersey

OFFICE OF THE ATTORNEY GENERAL
DEPARTMENT OF LAW AND PUBLIC SAFETY
DIVISION OF LAW
25 MARKET STREET
PO Box 112
TRENTON, NJ 08625-0112

PHILIP D. MURPHY
Governor

SHEILA Y. OLIVER
Lt. Governor

MATTHEW J. PLATKIN
Acting Attorney General

MICHELLE L. MILLER
Director

March 24, 2022

The Honorable Freda L. Wolfson, U.S.D.J.
United States District Court
For the District of New Jersey
Clarkson S. Fisher Building
& U.S. Courthouse
402 East State Street
Trenton, NJ 08608

Re: Daniel Francisco, et al. v. Peter S. Cooke, Jr.,
et al.
Civil Action No. 21-14575 (FLW-DEA)

Dear Chief Judge Wolfson:

I represent Defendants Acting Attorney General Matthew J. Platkin, Colonel Patrick J. Callahan, Lourdes Lucas, and Christopher J. Kazlau in the above captioned matter. I am writing this letter on behalf of all of the parties in this matter to jointly request a stay of this case pending a decision in the case now before the Supreme Court of the United States: New York State Rifle & Pistol Assn., Inc., et al. v. Keith M. Corlett, et al. That case presents a challenge under the Second Amendment to the State of New York's statutory regime governing individuals' ability to carry a handgun outside the home.

Similar to New Jersey's system where applicants are required to show a "justifiable need" to carry a handgun, New York's statutes require that applicants show a "proper cause" prior to obtaining a license to carry. There is a substantial likelihood that the Court's ruling in that case would govern or at least inform the ultimate result in this case and, as a result, the parties in this matter all jointly request that this case be stayed pending the disposition of the New York State Rifle and Pistol Association case. Thank you for your consideration of this request.



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Sincerely yours,

MATTHEW J. PLATKIN
ACTING ATTORNEY GENERAL OF NEW JERSEY

By: S/ Matthew J. Lynch
Matthew J. Lynch
Deputy Attorney General

Cc: Via ECF
Edward A. Paltzik, Esq.
Jonathan F. Cohen, Esq.